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September 30, 2024

Hon. Marian W. Payson
United States Magistrate Judge
100 State Street
Rochester, New York 14614

SENT VIA E-FILING

Re: United States v. Timothy Jackson Jr.
Case No. 24-MJ-4013



Dear Judge Payson:

I am respectfully requesting a 45 day adjournment of our status conference set for October 3rd.

We are continuing to review the extensive amount of audio tapes, transcripts, pole camera excerpts, and other discovery from the government. I have met and continue to meet with my client and will need additional time to review this extensive amount of discovery. I was recently advised that the government has an extensive amount of additional pole camera videos that it will be disclosing. Mr. Jackson is detained and I would like to have sufficient time to continue to review the materials with my client as a part of our assessment of this case. There has also been plea discussions concerning the possible resolution of this matter, which I need to review with my client.

I have communicated with AUSA Marangola and I understand that he does not object to this request. I further consent to the exclusion of time associated with the adjournment for Speedy Trial purposes.

Thank you for your consideration.

Very truly yours,

/s/ Maurice Verrillo

Maurice J. Verrillo
pc: Robert Marangola, AUSA via e-filing
Mr. Timothy Jackson Jr. via regular mail

PLEASE NOTE NEW ADDRESS